

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

STEVE M. BAJIC,  
RAJESH TANEJA,  
NORFOLK HEIGHTS LTD.,  
FOUNTAIN DRIVE LTD.,  
ISLAND FORTUNE GLOBAL LTD.,  
CRYSTALMOUNT LTD.,  
WISDOM CHAIN LTD.,  
SSID LTD.,  
SURE MIGHTY LTD.,  
TAMARIND INVESTMENTS INC.,  
KENNETH CIAPALA,  
ANTHONY KILLARNEY,  
BLACKLIGHT SA,  
CHRISTOPHER LEE MCKNIGHT, and  
AARON DALE WISE,

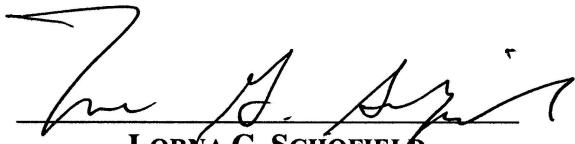
Defendants.

Civil Action No. 20-cv-00007-LGS

Defendant McKnight shall file any opposition by  
**November 29, 2022.** The opposition shall comport with  
the Court's Order at Dkt. No. 218.

So Ordered.

Dated: November 15, 2022  
New York, New York



LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

**PLAINTIFF'S MOTION FOR MONETARY REMEDIES AGAINST  
CHRISTOPHER MCKNIGHT**

Pursuant to the terms of the partial judgments previously entered by this Court against defendants Christopher McKnight (“McKnight”), plaintiff Securities and Exchange Commission (“the Commission”) hereby moves that the Court enter revised final judgments against McKnight in the form filed herewith that, in addition to the other remedies previously imposed, requires him to pay disgorgement of \$985,303, prejudgment interest of \$169,105 and a civil penalty of \$100,000, for a total of \$1,254,408. In support of this motion, the Commission submits the accompanying memorandum of law and a supplemental declaration by Trevor Donelan. Also filed herewith is a proposed form of Final Judgment as to defendants McKnight.

WHEREFORE, the Commission respectfully requests that the Court enter the proposed Final Judgments against defendant McKnight.

Dated: November 10, 2022

Respectfully submitted,

SECURITIES AND EXCHANGE COMMISSION  
By its attorneys,

/s/ Kathleen Burdette Shields  
Kathleen Burdette Shields (Mass Bar No. 637438)  
SECURITIES AND EXCHANGE COMMISSION  
Boston Regional Office  
33 Arch St., 24<sup>th</sup> Floor  
Boston, MA 02110  
Phone: (617) 573-8904  
Fax: (617) 573-4590 (fax)  
[Shieldska@sec.gov](mailto:Shieldska@sec.gov)

#### CERTIFICATE OF SERVICE

I hereby certify that on November 10, 2022, a true and correct copy of the foregoing document was filed through the Court's CM/ECF system, and accordingly, the document will be sent electronically to all participants registered to receive electronic notice in this case. A copy will also be sent via first class mail and/or email to those parties who have not yet registered for notice via the Court's CM/ECF system or have not yet appeared by counsel.

/s/ Kathleen Burdette Shields  
Kathleen Burdette Shields